

**Defendants' Objections to Plaintiff's
Deposition Designations
EXHIBIT D**

IN THE UNITED STATES DISTRICT COURT FOR THE
MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION

RUTH SMITH, Individually and as Widow for the
Use and Benefit of Herself and the Next Kin of
Richard Smith, Deceased,

Plaintiff,

v.

PFIZER, INC., *et al.*,

Defendants.

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)
)
) Civil No. 3:05-0444
) Judge Aleta A. Trauger
) (Dist. Of MA No.
) 1:05-cv-11515PBS)
)
)
)

DEFENDANTS' OBJECTIONS TO PLAINTIFF'S DEPOSITION DESIGNATIONS

Defendants, Pfizer Inc and Warner-Lambert Company LLC (collectively, "Pfizer" or "Defendants") have set out herein their objections to the deposition designations identified in Plaintiff's Revised Deposition Designations served on April 20, 2010. Defendants anticipate the need to assert additional objections depending upon the evidence presented by Plaintiff, the Court's evidentiary rulings, and/or other matters that may arise before or at trial. Accordingly, Defendants respectfully and specifically reserve the right to: (1) withdraw at any time any objections identified; (2) supplement and/or amend their objections in response to the Court's rulings on pretrial motions or other evidentiary matters; (3) supplemental and/or amend their objections in response to Plaintiff's intended and/or actual use of the testimony; and (4) supplement and/or amend their objections as otherwise permitted by the Court.

GENERAL OBJECTIONS

Defendants object to the use of any part of a deposition from which Plaintiff designated where the witness is within the subpoena power of the Court and where Plaintiff has not demonstrated that the witness is unavailable. Fed. R. Civ. P. 32(a)(4).

OBJECTIONS TO PLAINTIFF'S PROPOSED DESIGNATIONS

Defendants assert the following objections to Plaintiff's proposed deposition designations as identified by page and line:

Foundation: Out-of-court statements offered for their truth are hearsay not subject to any exception if they are made beyond the scope of a person's regular duties. *See* Fed. R. Evid. 802 and 803(6); *see also Redken Labs., Inc. v. Levin*, 843 F.2d 226, 229 (6th Cir. 1988). Also, a non-expert witness may not testify in the form of opinions or inferences beyond those opinions or inferences rationally based on the perception of the witness. *See* Fed. R. Evid. 701.

Hearsay: Absent a specific exception, evidence is inadmissible if it consists of an out-of-court statement offered for the truth of the matter asserted. Fed. R. Evid. 801, 802; *see also Rush v. Ill. Cent. R.R.*, 399 F.3d 705, 719 (6th Cir. 2005).

Hearsay-within-hearsay: Evidence is inadmissible if it consists of an out-of-court statement offered for the truth of the matter asserted and is hearsay-within-hearsay when those statements themselves contain out-of-court statements offered for the truth of the matter asserted. Each level of hearsay-within-hearsay is inadmissible absent some exception specific to each level. Fed. R. Evid. 805; *see also Smith v. Highland Park Ruritan Club*, No. 3:06-CV-351, 2008 WL 2669107, at *4 (E.D. Tenn. June 27, 2008).

Non-final agency finding: Evidence is inadmissible if it consists of an out-of-court statement offered for the truth of the matter asserted, even when those statements are made by

public agencies. Non-final, interim, or draft findings, or personal or other statements not made pursuant to agency authority do not fall under the public record exception to the hearsay rule and are, therefore, inadmissible. *See Toole v. McClintock*, 999 F.2d 1430 (11th Cir. 1993); *City of New York v. Pullman Inc.*, 662 F.2d 910, 915 (2d Cir. 1981) (quoting *United States v. Fosher*, 590 F.2d 381, 383 (1st Cir. 1979).

Irrelevant: Irrelevant evidence is inadmissible. Fed. R. Evid. 402. Irrelevant evidence does not “tend[] to make the existence of any fact that is of consequence to the determination of the action more probable or less probable than it would be without the evidence.” Fed. R. Evid. 401; *see also United States v. Blackwell*, 459 F.3d 739, 769 (6th Cir. 2006).

Irrelevant: Marketing, advertising, and publications (including other indications):

To the extent that Plaintiff has identified deposition testimony to purportedly support allegations of improper marketing, including testimony regarding publications on gabapentin and regarding other indications other than the indication for which Decedent was prescribed Neurontin, such testimony is irrelevant and inadmissible under Rules 401 and 402, the MDL court’s May 26, 2009 Order, and the facts of this case because there is no evidence connecting the testimony to the Decedent’s prescribers or their prescribing decision. (*See* Mem. & Order [1790] at 34, May 26, 2009); *see also In re Seroquel Prods. Liab. Litig.*, No. 06-MD-1769-Orl-22DAB, 2009 WL 223140, at *4-5 (M.D. Fla. Jan. 30, 2009); *Miller v. Pfizer, Inc.*, 196 F. Supp. 2d 1095, 1122-23 (D. Kan. 2002); *Alexander v. Smith & Nephew, P.L.C.*, 90 F. Supp. 2d 1225, 1235 (N.D. Ok. 2000); *In re Norplant Contraceptive Prods. Liab. Litig.*, No. MDL 1038, 1997 WL 81092, at *1 (E.D. Tex. Feb. 21, 1997).

Irrelevant: Other events: Reports of other events – *i.e.*, use of medications other than Neurontin, adverse event reports with medications other than Neurontin, and/or events other than

Decedent's – lack substantial similarity to this case, and are, therefore, inadmissible as evidence of other incidents or accidents pursuant to Rules 401-404. *See Engebretsen v. Fairchild Aircraft Corp.*, 21 F.3d 721, 732-33 (6th Cir. 1994); *Rye v. Black & Decker Mfg. Co.*, 889 F.2d 100, 102-03 (6th Cir. 1989); *Pride v. Bic Corp.*, 54 F. Supp. 2d 757, 760 (E.D. Tenn. 1998); *Soldo v. Sandoz Pharms. Corp.*, 244 F. Supp. 2d 434, 550-551 (W.D. Pa. 2003); *Wolf v. Proctor & Gamble Co.*, 555 F. Supp. 613, 622 (D.N.J. 1982).

Irrelevant: The Franklin litigation and other claims or actions: Evidence from the *Franklin* litigation and other claims, actions, or legal proceedings are inadmissible because they have no tendency to make more or less probable the existence of any fact of consequence. *See, e.g., McLeod v. Parsons Corp.*, 73 F. App'x 846, 853-54 (6th Cir. 2003); *CPC Int'l v. Northbrook Excess & Surplus Ins. Co.*, 144 F.3d 35, 45 (1st Cir. 1998); *Kinan v. City of Brockton*, 876 F.2d 1029, 1034-35 (1st Cir. 1989); *Barnes v. Koppers, Inc.*, No. 3:03CV60-P-D, 2006 WL 940279, at *3 (N.D. Miss. Apr. 11, 2006). In addition to being inadmissible under Rules 401 and 402, this deposition testimony is inadmissible under the MDL court's Fraud Order, and the facts of this case because there is no evidence connecting the exhibit to Decedent's prescribers or their prescribing decision. Deposition testimony from the *Franklin* litigation or other proceedings is inadmissible because it constitutes hearsay. Evidence is inadmissible as hearsay if it consists of an out-of-court statement offered for the truth of the matter asserted, even when those statements are made in a deposition from another litigation and the issues are sufficiently different that Defendant did not have the same opportunity and motive to cross-examine the witness. *See Fed. R. Evid.* 801; *Ritchie ex rel. Estate of Ritchie v. Stamler Corp.*, No. 98-5750, 2000 U.S. App. LEXIS 568, at *10-11 (6th Cir. Jan. 12, 2000).

Irrelevant: New Warning: Under Rule 407, measures taken after an injury or harm allegedly caused by an event, that if taken previously, would have made the injury or harm less likely to occur, are not admissible to prove negligence, culpable conduct, a defect in a product, a defect in a product's design, or a need for a warning or instruction. Fed. R. Evid. 407. Thus, deposition testimony regarding Neurontin's new warning label and patient information guides is inadmissible to show liability under Rule 407. *See Stahl v. Novartis Pharms. Corp.*, 283 F.3d 254, 270 n.10 (5th Cir. 2002); *Lindsay v. Ortho Pharm. Corp.*, 637 F.2d 87, 94 (2d Cir. 1980); *Werner v. Upjohn Co.*, 628 F.2d 848, 854 (4th Cir. 1980); *see also Gray v. Hoffman-La Roche, Inc.*, 82 F. App'x 639, 646 (10th Cir. 2003).

Lack of personal knowledge: A witness may not testify to a matter unless evidence is introduced to show that the witness has personal knowledge of the matter. Fed. R. Evid. 602.

Rule of completeness: When a part of deposition testimony is offered into evidence by a party, an adverse party may introduce any other parts which ought in fairness to be considered with the part introduced. Fed. R. Civ. P. 32(a)(6); *see also* Fed. R. Evid. 106; *United States v. Holden*, 557 F.3d 698 (6th Cir. 2009).

Probative value substantially outweighed: To the extent the Court determines that deposition testimony objected to by Defendants on any relevancy ground is relevant, the testimony should still be excluded under Rule 403 because its probative value, if any, is substantially outweighed by the danger of unfair prejudice, confusion of the issues, or misleading the jury, or by considerations of undue delay, waste of time, or needless presentation of cumulative evidence. Fed. R. Evid. 403; *see Old Chief v. United States*, 519 U.S. 172, 180 (1997); *Schrand v. Fed. Pac. Elec. Co.*, 851 F.2d 152, 156 (6th Cir. 1988).

Answer fragment: Plaintiff designated only a portion of an answer, or designated an answer with no corresponding question.

Argumentative: The question is improper argument directed to the witness.

Asked and answered: The question has been previously asked and answered by the witness.

Assumes facts not in evidence. Question is premised on “facts” that have not been offered into evidence.

Compound. The question contains two or more separate questions.

Counsel testifying: The question consists of narrative by counsel rather than a question to the witness.

Cumulative: The question seeks testimony already provided by the witness. Fed. R. Evid. 403, 611; *see also United States v. Lloyd*, 462 F.3d 510, 516-17 (6th Cir. 2006).

Fails to refresh recollection: When an exhibit introduced at a deposition fails to refresh the witness’s recollection, any testimony regarding the exhibit lacks foundation.

Form: The question is asked in an improper form.

Harassing the witness: The question is asked in a manner that harasses the witness.

Improper predicate: The question is preceded by improper colloquy.

Incomplete hypothetical: The question consists of a hypothetical that omits facts and is thus misleading to the jury.

Lack of personal knowledge: The witness has no knowledge of the subject matter of the question.

Misstates facts: The question misstates the facts contained in the record.

Misstates testimony: The question misstates previous testimony provided by the deponent or other witness.

Non-responsive: The designated testimony is not responsive to the question.

Privilege: The question seeks to elicit testimony that is protected by the attorney-client privilege.

Question fragment The designation consists of a portion of a question or a question with no corresponding answer.

Speculative: The question calls for the witness to speculate or guess about a subject.

Vague/ambiguous: The question is confusing, vague, ambiguous, and unintelligible.

INCORPORATION OF DEFENDANTS' MOTIONS *IN LIMINE*

Defendants incorporate by reference all objections to exhibits identified in designated testimony set forth in Defendants' Objections to Plaintiff's Proposed Trial Exhibits. Defendants also incorporate herein the following motions *in limine*, and object to any exhibit on these grounds, based on their requests that the Court enter an Order excluding:

1. The guilty plea dated May 13, 2004; any negotiation, settlement, or agreement between Pfizer and/or Warner-Lambert with any government entity arising out of the guilty plea; or any related government finding or investigation of marketing of Neurontin in violation of the Food, Drug, and Cosmetic Act, and the fact of any such investigation.

2. Evidence offered by Plaintiff to show allegedly improper marketing or other conduct, including any marketing, advertising, or promotional materials or conduct concerning Neurontin (whether for off-label use or otherwise), including but not limited to, evidence of promotion, studies, letters from DDMAC, publications, testimony of sales and marketing representatives other than those who called on Decedent's prescribers, and other evidence not

relied upon by Decedent's prescribers, as well as evidence of or reference to any other claims, actions, or legal proceedings related to Neurontin.

3. Any testimony of David Franklin or evidence of, or reference to, the separate and unrelated *qui tam* action styled *United States ex rel. Franklin v. Parke-Davis, Division of Warner-Lambert Company, & Pfizer Inc.*, Civil Action No. 1:96-DV-11651-PBS (D. Mass filed Aug. 13, 1996).

4. All evidence of and references to Food and Drug Administration regulatory actions related to Neurontin, including labeling, labeling changes, and patient information guides for Neurontin, that were issued after Richard Smith's death in May 2004.

5. Conduct unrelated to Neurontin, including (i) an August 31, 2009, settlement among Pfizer, the United States Department of Justice, and certain other government agencies, pursuant to which Pfizer and the Government agreed to settle certain *qui tam* actions against Pfizer involving drugs other than Neurontin and (ii) a plea agreement between the Government and Pharmacia & Upjohn Company, Inc. involving the drug Bextra, as well as any related government finding or investigation in connection with the August 2009 Settlement or Pharmacia Plea.

6. Miscellaneous matters including references to Plaintiff's pleadings; evidence of or references to Defendants' corporate status, size, profits, financial condition, or employee compensation; evidence of or references to alleged conduct of a generic "pharmaceutical industry" or "drug companies"; references to the cost or resources of Defendants' legal defense or to the size, location, other clients, or nature of the legal practice of Defendants' or Plaintiff's law firms; evidence of or references to Defendants' insurance; references to the presence or absence of Defendants' corporate representatives at trial; evidence of or references to how

Decedent's beneficiaries will use any jury award if Plaintiff prevails; attempts to instruct the jury as to the effect of its answers to the questions posed in the jury verdict form; references to the Golden Rule; evidence of or references to discovery disputes between the parties or other discovery activities by the parties; and post-mortem photographs.

7. Evidence of or reference to anecdotal adverse event reports.

8. Evidence, references, testimony or argument that Plaintiff's decedent's adult children have suffered any compensable harms as a result of their father's death. Any evidence or argument explicitly or impliedly suggesting that the impact of decedent's suicide on the adult children has any bearing on the amount of "consortium" damages, if any, that the jury might be asked to award to Plaintiff Ruth Smith as a result of her husband's suicide.

9. Testimony of Professor Charles King, III, an economist whom Plaintiff has designated as an expert witness. Professor King's testimony is inadmissible because it is irrelevant to the particular facts of this case, substantially prejudicial, and the product of unreliable methodology.

DEFENDANTS' OBJECTIONS

Larry Alphs

June 21, 2007

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Frank Berklacich

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Gary Biggs

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Lewis Carnahan

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Lucy Castro

July 10, 2007

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Page: Objection(s):	0431:15 - 0431:25 Relevance
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Page: Objection(s):	0441:03 - 0441:08 Foundation; Probative Value Outweighed by Prejudice; Relevance
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Page: Objection(s):	0441:15 - 0441:15 Assumes facts not in evidence; Form; Foundation
Page: Objection(s):	0441:16 - 0441:18 Lack of personal knowledge
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Page: Objection(s):	0444:10 - 0445:04 Probative Value Outweighed by Prejudice; Relevance
Page: Objection(s):	0445:05 - 0445:09 Foundation; Probative Value Outweighed by Prejudice; Relevance; Vague/Ambiguous
Page: Objection(s):	0445:11 - 0445:12 Foundation; Probative Value Outweighed by Prejudice; Relevance; Vague/Ambiguous
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Page: Objection(s):	0446:06 - 0446:06 Probative Value Outweighed by Prejudice; Relevance; Speculation
Page: Objection(s):	0446:09 - 0446:10 Probative Value Outweighed by Prejudice; Relevance; Speculation
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Page: Objection(s):	0447:04 - 0447:07 Foundation; Misstates facts; Probative Value Outweighed by Prejudice; Relevance
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Page: Objection(s):	0460:17 - 0460:19 Counsel testifying
Page: Objection(s):	0462:21 - 0463:06 Asked/answered; Foundation
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Page: Objection(s):	0477:23 - 0478:21 Probative Value Outweighed by Prejudice; Relevance
Page: Objection(s):	0507:10 - 0508:03 Probative Value Outweighed by Prejudice; Relevance
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James Cato

June 29, 2007

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Page: Objection(s):	0079:03 - 0079:10 Lack of personal knowledge; Relevance
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Page: Objection(s):	0081:11 - 0081:19 Counsel testifying ; Form; Relevance
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Stephen Cristo

February 17, 2005

Page: Objection(s):	0067:17 - 0067:18 Form; Vague/Ambiguous
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Suzanne Doft

June 12, 2007

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Page: Objection(s):	0396:24 - 0397:12 Probative Value Outweighed by Prejudice; Relevance: Marketing; Relevance: Plea
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Page: Objection(s):	0410:22 - 0410:22 Probative Value Outweighed by Prejudice; Question fragment; Relevance: Marketing
Page: Objection(s):	0420:12 - 0420:14 Hear within Hearsay; Probative Value Outweighed by Prejudice; Relevance: Marketing; Relevance
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Page: Objection(s):	0477:03 - 0477:06 Lack of personal knowledge; Probative Value Outweighed by Prejudice; Relevance: Marketing; Relevance: Plea
Page: Objection(s):	0482:13 - 0482:23 Compound; Form; Foundation Improper predicate; Probative Value Outweighed by Prejudice; Relevance: Marketing; Relevance: Plea
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Objection(s):	Form; Probative Value Outweighed by Prejudice; Relevance :Marketing; Relevance: Plea
Page: Objection(s):	0486:04 - 0486:06 Form; Probative Value Outweighed by Prejudice; Relevance: Marketing; Relevance: Plea

Helen Duda-Racki

February 24, 2005

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Bruce Fleischmann

June 13, 2007

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Page: Objection(s):	0092:11 - 0093:09 Lack of personal knowledge; Relevance: Marketing
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Page: Objection(s):	0093:19 - 0093:21 Form; Relevance: Marketing
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Page: Objection(s):	0094:12 - 0094:16 Lack of personal knowledge; Relevance: Marketing
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Page: Objection(s):	0180:02 - 0180:06 Assumes facts not in evidence; Probative Value Outweighed by Prejudice; Relevance: Marketing
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John Ford
September 30, 2002

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David Franklin

September 12, 2000

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David Franklin

September 13, 200

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David Franklin

December 18, 2009

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Robert Glanzman

August 1, 2007

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Robert Glanzman

August 2, 2007

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Manfred Hauben

July 12, 2007

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Manfred Hauben

July 13, 2007

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Buford Hoskins

October 24, 2007

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Lloyd Knapp

June 26, 2007

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Lloyd Knapp

June 27, 2007

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Lloyd Knapp

June 28, 2007

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Lloyd Knapp

July 18, 2006

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John Knoop

January 23, 2008

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John Knoop
January 24, 2008

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Pamela Krancer

June 8, 2007

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Gayle Lawson

October 4, 2007

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Feng Li

February 8, 2008

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Edward Mackey

May 23, 2007

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Paul McCombs

June 8, 2007

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Cynthia McCormick

February 14, 2008

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Avanish Mishra

June 14, 2007

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Avanish Mishra

June 15, 2007

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Ashley Moreland

July 25, 2007

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February 7, 2008

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Cindy Smith-Charlton

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Leslie Tive
July 11, 2007

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Jareth Turner

October 11, 2007

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Christopher Wood

June 7, 2007

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DEFENDANTS' PROPOSED DEPOSITION COUNTER DESIGNATIONS

Larry Alphs: June 21, 2007

0167:05 - 0167:06

Larry Alphs: June 22, 2007

0621:10 - 0626:15

0643:21 - 0647:06

Lewis Carnahan: October 23, 2007

0036:01 - 0036:04

Lucy Castro: July 10, 2007

0031:04 - 0031:10

0033:13 - 0033:25

0046:18 - 0047:05

0104:24 - 0105:03

0105:08 - 0105:10

0349:10 - 0349:25

0368:02 - 0368:11

Lucy Castro: July 11, 2007

0423:25 - 0424:10

0444:03 - 0444:05

0451:19 - 0451:25

0461:03 - 0461:14

0551:03 - 0551:04

0635:23 - 0639:03

0639:08 - 0640:10

0640:11 - 0641:04

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0695:02 - 0696:15

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0701:03 - 0701:22

0711:05 - 0711:24

0712:19 - 0713:07

0716:03 - 0718:22

0730:02 - 0730:24

Stephen Cristo: Feburary 17, 2005

0015:09 - 0015:25

Suzanne Doft: June 12, 2007

0149:10 - 0149:14

0338:11 - 0338:14

0631:14 - 0634:02

0636:21 - 0638:08

0640:14 - 0644:03

0644:04 - 0646:13

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0662:18 - 0664:06

0664:08 - 0667:04

0668:23 - 0669:08

0675:13 - 0675:20

Helen Duda-Racki: February 24, 2005

0042:04 - 0043:09

0060:23 - 0061:07

0069:24 - 0070:04

0070:12 - 0070:14

0071:04 - 0071:19

John Ford: September 30, 2002

0009:18 - 0010:05

0010:15 - 0010:18

0011:13 - 0015:03

0057:11 - 0058:03

0064:15 - 0066:12

0113:18 - 0113:21

0114:05 - 0114:08

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0380:23 - 0381:17

0381:23 - 0386:01

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0390:22 - 0392:07

0393:23 - 0394:03

David Franklin: September 12, 2000

0098:13 - 0099:24

David Franklin: September 13, 2000

0025:05 - 0026:24

0036:01 - 0039:22

0059:23 - 0060:01

0071:08 - 0074:24

0077:07 - 0083:23

0097:21 - 0100:15

0102:21 - 0103:18

0111:06 - 0111:15

0112:09 - 0113:07

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0185:22 - 0188:24

0268:06 - 0268:13

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0334:18 - 0335:07

David Franklin: December 18, 2009

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0018:20 - 0020:17

0021:14 - 0023:23

0025:05 - 0025:13

0027:03 - 0028:17

0030:21 - 0030:23

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0066:13 - 0067:07

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0082:08 - 0083:11

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0097:21 - 0099:21

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0114:09 - 0115:05

0115:14 - 0116:06

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0123:13 - 0125:16
0128:21 - 0129:01
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0136:22 - 0137:21
0144:05 - 0144:13
0145:15 - 0145:19
0146:08 - 0146:13
0146:14 - 0147:02
0147:13 - 0148:02
0148:09 - 0149:12
0149:23 - 0150:04
0151:04 - 0152:08
0155:09 - 0155:20
0157:07 - 0157:11
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0158:22 - 0159:04
0163:18 - 0164:05
0176:04 - 0176:15
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0176:19 - 0177:04

0177:06 - 0177:06

0183:11 - 0184:09

0199:16 - 0200:07

0202:03 - 0202:07

0205:03 - 0205:12

Robert Glanzman: August 1, 2007

0011:11 - 0011:17

0011:18 - 0012:03

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0122:04 - 0122:10

0350:08 - 0350:23

Robert Glanzman: August 2, 2007

0688:07 - 0688:25

0690:18 - 0693:05

0700:10 - 0704:13

0715:08 - 0718:08

0719:19 - 0720:11

0720:12 - 0722:07

0724:23 - 0725:12

0751:23 - 0753:24

Manfred Hauben: July 12, 2007

0017:21 - 0020:19

0140:22 - 0141:01

0142:23 - 0143:04

Manfred Hauben: July 13, 2007

0416:03 - 0416:11

Lloyd Knapp: July 26, 2007

0016:17 - 0016:22

0077:18 - 0078:07

0113:13 - 0114:02

0154:13 - 0154:22

0217:10 - 0218:01

Lloyd Knapp: July 27, 2007

0283:23 - 0284:06

0295:04 - 0295:07

0368:19 - 0368:19

0374:22 - 0375:01

0376:11 - 0376:24

0377:10 - 0377:12

0401:05 - 0401:10

0409:02 - 0409:03

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0412:03 - 0412:15

0419:17 - 0419:24

0433:24 - 0434:06

0466:14 - 0466:25

Lloyd Knapp: July 28, 2007

0596:15 - 0597:01

0598:25 - 0599:17

0637:09 - 0637:23

Lloyd Knapp: July 18, 2006

0011:23 - 0012:08

0025:03 - 0025:08

0080:13 - 0083:11

0084:02 - 0084:10

0098:03 - 0098:24

0104:07 - 0104:25

0105:06 - 0105:09

0113:15 - 0114:07

0189:13 - 0190:03

0205:25 - 0209:04

John Knoop: January 23, 2008

0010:10 - 0010:11

0011:07 - 0011:21

Pamela Krancer: June 8, 2007

0036:16 - 0036:22

Gayle Lawson: October 4, 2007

0076:24 - 0077:02

Edward Mackey: May 23, 2007

0084:19 - 0087:18

0088:05 - 0090:10

0091:05 - 0093:02

0110:14 - 0111:11

0112:02 - 0114:06

0115:23 - 0117:18

John Marino: July 3, 2007

0016:09 - 0016:17

0017:23 - 0017:25

0034:04 - 0035:09

0036:03 - 0036:07

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0260:13 - 0260:24

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0285:02 - 0285:05

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0394:13 - 0394:16

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0598:11 - 0602:03

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0628:16 - 0630:05

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Paul McCombs: June 8, 2007

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0033:04 - 0033:24

0034:14 - 0035:03

Cynthia McCormick: February 14, 2008

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0023:14 - 0024:14

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0044:22 - 0048:08

0052:12 - 0053:09

0061:07 - 0062:08

0067:18 - 0068:21

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0084:19 - 0085:10

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Avanish Mishra: June 15, 2007

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Ashley Moreland: July 25, 2007

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0110:14 - 0110:17

0114:23 - 0114:25

0115:20 - 0116:03

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0125:08 - 0126:01

0144:05 - 0145:05

Atul Pande: September 19, 2007

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0119:22 - 0120:07

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0366:14 - 0366:15

Atul Pande: September 20, 2007

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0662:16 - 0663:04

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0667:10 - 0668:01

Danny Satterfield: February 7, 2008

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Drusilla Scott: December 13, 2007

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0202:10 - 0202:21

0233:14 - 0233:18

0236:10 - 0236:17

0258:10 - 0258:25

0270:18 - 0270:24

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0677:10 - 0677:24

0678:06 - 0679:14

0684:19 - 0684:19

0685:03 - 0688:06

Charles Taylor: June 4, 2007

0043:06 - 0043:23

0044:15 - 0045:08

0046:18 - 0047:04

0048:04 - 0048:13

0050:02 - 0050:17

0050:21 - 0051:04

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0289:09 - 0290:03

0291:02 - 0291:25

0300:12 - 0303:12

0303:13 - 0306:08

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Charles Taylor: August 27, 2009

0132:21 - 0133:21

0199:02 - 0199:13

0233:25 - 0234:07

0249:11 - 0249:23

0250:01 - 0250:02

Martin Teicher: July 7, 2006

0094:09 - 0094:12

Leslie Tive: July 11, 2007

0505:10 - 0506:13

0506:16 - 0506:22

0026:15 - 0026:24

0289:15 - 0290:01

Christopher Wood: June 7, 2007

0047:10 - 0048:05

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Respectfully submitted,

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